

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
WACO DIVISION**

THETA IP, LLC.,

Plaintiff,

v.

SAMSUNG ELECTRONICS CO., LTD.,
and SAMSUNG ELECTRONICS
AMERICA, INC.

Defendants.

Civil Action No.: WA:20-CV-00160-ADA

JURY TRIAL DEMANDED

JOINT MOTION TO STAY PENDING FINAL SETTLEMENT

Plaintiff Theta IP, LLC (“Theta”) and Defendants Samsung Electronics Co., Ltd., and Samsung Electronics America, Inc. (“Samsung”), by and through their undersigned counsel, provide notice that the Parties reached an agreement in principle to settle all claims of the instant proceeding. The Parties expect to finalize the agreement and jointly move to dismiss the case within sixty days.

The parties therefore seek a sixty-day stay of all proceedings and deadlines (up to and including March 18, 2022). The requested stay is not sought for delay, but so that justice may be served, and the final terms of an agreement memorialized and carried out.

Dated: January 17, 2022

Respectfully submitted,

/s/ Denise M. De Mory

Denise M. De Mory (*pro hac vice*)
California State Bar No. 168076
Henry C. Bunsow (*pro hac vice*)
California State Bar No. 60707
Aaron R. Hand (*pro hac vice*)
California State Bar No. 245755
Corey Johanningmeier (*pro hac vice*)
California State Bar No. 251297
Hillary Bunsow (*pro hac vice*)
California State Bar No. 278719
Michael Flynn-O'Brien (*pro hac vice*)
California State Bar No. 291301
Bunsow De Mory LLP
701 El Camino Real
Redwood City, CA 94063
(650) 351-7241 telephone
(415) 426-4744 facsimile
ddemory@bdiplaw.com
hbunsow@bdiplaw.com
ahand@bdiplaw.com
cjohanningmeier@bdiplaw.com
hillarybunsow@bdiplaw.com
mflynnobrien@bdiplaw.com

Attorney in Charge for Plaintiff Theta IP, LLC

B. Russell Horton
State Bar No. 10014450
George Brothers Kincaid & Horton, L.L.P.
114 West 7th Street, Ste. 1100
Austin, Texas 78701
(512) 495-1400 telephone
(512) 499-0094 facsimile
rhorton@gbkh.com

Attorney for Plaintiff Theta IP, LLC

/s/ Ruffin B. Cordell

Melissa R. Smith
(State Bar No. 24001351)
James T. Underwood (State Bar No. 24102587)
GILLAM & SMITH, LLP
303 South Washington Avenue
Marshall, Texas 75670
Telephone: (903) 934-8450
melissa.gillamsmithlaw.com

Ruffin B. Cordell (DC Bar No. 459780)
Michael J. McKeon (NY Bar No. 2793883)
Daniel A. Tishman (DC Bar No. 459780)
Ryan M. Teel (DC Bar No. 1044020)
Matthew Mosteller (CA Bar No. 324808)
FISH & RICHARDSON P.C.
1000 Maine Avenue, S.W., Suite 1000
Washington, DC 20024
Telephone: (202) 783-5070
Email: cordell@fr.com; mckeon@fr.com;
tishman@fr.com; teel@fr.com;
mosteller@fr.com

Francis J. Albert
(CA Bar No. 247741)
FISH & RICHARDSON P.C.
12860 El Camino Real, Suite 400
San Diego, CA 92130
Telephone: (858) 678-5070
Email: albert@fr.com

Chet D. Campbell (MA Bar No. 688190)
FISH & RICHARDSON PC
One Marina Park Drive
Boston, MA 02210-1878
Telephone: 617-542-5070
Email: cycampbell@fr.com

S. Michael Song (CA State Bar No. 198656)
Michael Joshi (CA State Bar No. 302184)
Madeleine Ball (CA State Bar No. 336923)
Admitted pro hac vice
michael.song@dechert.com
michael.joshi@dechert.com

madeleine.ball@dechert.com
Dechert LLP
3000 El Camino Real
Five Palo Alto Square, Suite 650
Palo Alto, CA 94036
(650) 813-4800

Martin J. Black (PA State Bar No. 54319)
Derek J. Brader (PA State Bar No. 312513)
Admitted pro hac vice
martin.black@dechert.com
derek.brader@dechert.com
Dechert LLP
Cira Centre
2929 Arch Street
Philadelphia, PA 19104
(215) 994-4000

***Attorneys for Samsung Electronics Co., Ltd.
and Samsung Electronics America, Inc.***

CERTIFICATE OF SERVICE

The undersigned hereby certifies that the foregoing document was filed and received by all counsel of record using the Court's CM/ECF system on January 17, 2022.

/s/ Denise M. De Mory
Denise M. De Mory